

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

B.P., H.A., and S.H., individually, and on)
Behalf of all others similarly situated,)
)
Plaintiffs,)
)
VERSUS)
)
CITY OF JOHNSON CITY, TENNESSEE, *et al*)
)
Defendants.)

No. 2:23-cv-00071-TRM-CRW

NOTICE OF FILING

COMES NOW the Defendant, Kevin Peters, in his individual capacity, by and through counsel, and gives notice of the filing of the attached redacted materials in support of the Motion for Attorneys' Fees (DE 196) and Reply (DE 212):

1. Excerpts of the Deposition of B.P. discussing the timeline of meeting Female 1 and being introduced to Sean Williams (as discussed in ¶¶ 23-37 of the Second Amended Complaint (DE 121)), which are contradictory to the contemporaneous text messages from B.P. that were inexplicably not produced by her until May 30, 2024, not produced until after her deposition despite being responsive to the Rule 34 requests from November 14, 2023, which are the subject of the Motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically with the Court. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

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This the 13th day of June, 2024.

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